

**IN THE MIDDLE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA,	:	Crim No.: 1:CR-01-215
Plaintiff	:	
	:	(Judge Caldwell)
v.	:	
	:	
SCOTT SHREFFLER,	:	
Defendant	:	

MOTION FOR CONTINUANCE

AND NOW comes Defendant, Scott Shreffler, by and through his attorney, Andrew J. Ostrowski, Esquire, and in support of his Motion for Continuance avers as follows:

1. By Order dated April 11, 2006, this Court scheduled a hearing on Sentencing and Related Matters to be held on May 9, 2006.
2. Counsel for Defendant has not had an opportunity to meet with the Defendant to review all issues relevant to the sentencing proceeding, and the Government has indicated that it intends to propose stipulations to the Defendant to streamline the proceeding in light of the Third Circuit opinion and Order remanding this matter for resentencing, but that task has not been accomplished as of this filing.
3. Accordingly, Counsel for the Defendant respectfully request that the

sentencing hearing be continued for several weeks in order to accommodate the foregoing concerns.

4. Counsel for Defendant has contacted Counsel for Government who has concurred in this request.

WHEREFORE, Defendant respectfully request that this Court enter an appropriate Order consistent with the foregoing.

Respectfully submitted,

/s/ Andrew J. Ostrowski, Esquire
Andrew J. Ostrowski, Esquire
I.D. No.: 66420
BAILEY & OSTROWSKI
4311 North Sixth Street
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(717) 221-9500
Attorney for Defendant

Dated: May 2, 2006

CERTIFICATE OF SERVICE

I, Andrew J. Ostrowski, hereby certify that I have served a true and correct copy of the foregoing document, by electronic means, as follows:

Martin C. Carlson
Assistant U.S. Attorney
Federal Building
Harrisburg, PA 17108

/s/ Andrew J. Ostrowski, Esquire
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Dated: May 2, 2006